

EXHIBIT B

Rebuttal to Dr. Kevin Quinn's Expert Report and Analysis of Notice-and-Cure Process in 2024 Primary and General Elections

In the Matter of

DEMOCRACY NORTH CAROLINA; NORTH CAROLINA BLACK ALLIANCE; LEAGUE
OF WOMEN VOTERS OF NORTH CAROLINA,

Plaintiffs,

v.

ALAN HIRSCH, in his official capacity as CHAIR OF THE STATE BOARD OF ELECTIONS;
JEFF CARMON III, in his official capacity as SECRETARY OF THE STATE BOARD OF
ELECTIONS; STACY EGGERS IV, in his official capacity as MEMBER OF THE STATE
BOARD OF ELECTIONS; KEVIN LEWIS, in his official capacity as MEMBER OF THE
STATE BOARD OF ELECTIONS; SIOBHAN O'DUFFY MILLEN, in her official capacity as
MEMBER OF THE STATE BOARD OF ELECTIONS; KAREN BRINSON BELL, in her
official capacity as EXECUTIVE DIRECTOR OF THE STATE BOARD OF ELECTIONS;
NORTH CAROLINA STATE BOARD OF ELECTIONS; PHILIP E. BERGER, in his official
capacity as Senate President *pro tempore* of the North Carolina Senate; DESTIN HALL, in his
official capacity as Speaker of the North Carolina House of Representatives.

Defendants.

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH
CAROLINA

Civil Action No. 23-878

Prepared for

Nelson Mullins

Prepared by

Paul F. White, Ph.D.

Partner

Resolution Economics, LLC

Washington, D.C. March 26, 2025

its mail verification notice procedure to verify the addresses provided on voter registration applications prior to the passage of SB 747 and data from elections in 2024 after the passage of SB 747 when the one-mailer verification system for same-day registrants included a notice-and-cure process” and to “provide insight into the extent to which the changes to the mail verification process for same-day registrants required by SB 747 may or may not cause eligible North Carolina voters to be disenfranchised.”¹ Resolution Economics was also asked to analyze the outcomes of the Notice-and-Cure Process implemented in the 2024 primary and general elections.

On March 20, 2025, Dr. Quinn provided a supplemental report to update some of his findings in his March 5, 2025 report. The supplemental report and backup material were provided less than 5 business days prior to the due date of this report, therefore most of the discussion in this report is based on Dr. Quinn’s initial March 5 report. Nevertheless, this report also contains some comments on Dr. Quinn’s supplemental report. I reserve the right to supplement my conclusions as needed based on my ongoing review of that report.

II. Sources of Information

The sources of information I reviewed for the preparation of this report are the following:

- Expert Report of Dr. Kevin M. Quinn, dated March 5, 2025
- Dr. Kevin Quinn’s backup data and programs for his expert report dated March 5, 2025
 - 1.prepwork.do

¹ Dr. Quinn March 5, 2025 expert report, paragraph 13

- 2.publicvoterhistory.R
- 3.twomailer.R
- 4.2024SDR.R
- Aggregate-EarlyVoting.R
- Aggregate-SameDayRegistration.R
- Youth-SameDayRegistration.R
- YouthVoting.R
- county_key.csv
- turnout_tables.xlsx
- Supplemental Expert Report of Dr. Kevin M. Quinn, dated March 20, 2025
- Dr. Kevin Quinn’s backup program for his supplemental expert report dated March 20, 2025
 - supplemental_analysis_replication.R
- Publicly available election data, used by Dr. Quinn in his analyses:
 - Voter Snapshots (linked from:

<https://dl.ncsbe.gov/?prefix=data/Snapshots/>)²
 - Absentee Files (linked from <https://dl.ncsbe.gov/?prefix=ENRS/>)³

² The Voter Snapshots consist of 28 files: VR_Snapshot_20140506.zip, VR_Snapshot_20141104.zip, VR_Snapshot_20160315.zip, VR_Snapshot_20161108.zip, VR_Snapshot_20180508.zip, VR_Snapshot_20181106.zip, VR_Snapshot_20200303.zip, VR_Snapshot_20201103.zip, VR_Snapshot_20220517.zip, VR_Snapshot_20221108.zip, VR_Snapshot_20240305.zip, VR_Snapshot_20241105.zip, VR_Snapshot_20100101.zip, VR_Snapshot_20110101.zip, VR_Snapshot_20120101.zip, VR_Snapshot_20130101.zip, VR_Snapshot_20140101.zip, VR_Snapshot_20150101.zip, VR_Snapshot_20160101.zip, VR_Snapshot_20170101.zip, VR_Snapshot_20180101.zip, VR_Snapshot_20190101.zip, VR_Snapshot_20200101.zip, VR_Snapshot_20210101.zip, VR_Snapshot_20220101.zip, VR_Snapshot_20230101.zip, VR_Snapshot_20240101.zip, and VR_Snapshot_20250101.zip.

³ The Absentee Files consist of 32 files: absentee_20140506.txt, absentee_20141104.csv, absentee_20160315.csv, absentee_20161108.csv, absentee_20170912.csv, absentee_20171010.csv, absentee_20171107.csv,

- Provisional Voting Files (Linked from:
<https://dl.ncsbe.gov/?prefix=ENRS/>)⁴
- Public Voter Files (Linked from <https://dl.ncsbe.gov/?prefix=data/>)⁵
 - nchis_Statewide.txt
 - ncvoter_Statewide.txt
- Electronic data files containing transaction-level mail verification process data for voter registration applications in North Carolina used by Dr. Quinn in some of his report tables
 - 2025-02-01 litigation_ticket_124972_1stVFY_status_list.txt (1stVFY Status List)
 - 2025-02-01 litigation_ticket_124972_1stVFY_voter_list.txt (1stVFY Voter List)
 - 2025-02-01 litigation_ticket_124972_Denied_status_list.txt (Denied Status List)
 - 2025-02-01 litigation_ticket_124972_Denied_voter_list.txt (Denied Voter List)

absentee_20180508.csv,
absentee_20190514.csv,
absentee_20191105.csv,
absentee_20211005.csv,
absentee_20221108.csv,
absentee_20231010.csv,
absentee_20241105.csv

absentee_20180626.csv,
absentee_20190709.csv,
absentee_20200303.csv,
absentee_20211102.csv,
absentee_20221206.csv,
absentee_20231107.csv,

absentee_20181106.csv,
absentee_20190910.csv,
absentee_20200623.csv,
absentee_20220517.csv,
absentee_20230307.csv,
absentee_20240305.csv,

absentee_20190430.csv,
absentee_20191008.csv,
absentee_20201103.csv,
absentee_20220726.csv,
absentee_20230912.csv,
absentee_20240514.csv,

⁴ The Provisional Voting Files consist of 44 files: provisional_20100504.txt, provisional_20100622.txt, provisional_20101102.txt, provisional_20120508.txt, provisional_20120717.txt, provisional_20121106.txt, provisional_20131105.txt, provisional_20140506.txt, provisional_20140715.txt, provisional_20141104.txt, provisional_20150915.txt, provisional_20151006.txt, provisional_20151103.txt, provisional_20160315.txt, provisional_20160607.txt, provisional_20161108.txt, provisional_20170912.txt, provisional_20171010.txt, provisional_20171107.txt, provisional_20180508.txt, provisional_20180626.txt, provisional_20181106.txt, provisional_20190430.txt, provisional_20190514.txt, provisional_20190709.txt, provisional_20190910.txt, provisional_20191008.txt, provisional_20191105.txt, provisional_20200303.txt, provisional_20200623.txt, provisional_20201103.txt, provisional_20211005.txt, provisional_20211102.txt, provisional_20220517.txt, provisional_20220726.txt, provisional_20221108.txt, provisional_20221206.txt, provisional_20230307.txt, provisional_20230912.txt, provisional_20231010.txt, provisional_20231107.txt, provisional_20240305.txt, provisional_20240514.txt, provisional_20241105.txt

⁵ The nchis_Statewide.txt used in Dr. Quinn's report is dated as of 2/23/2025, whereas the nchis_Statewide.txt used in this report is dated as of 3/2/2025. The ncvoter_Statewide.txt used in Dr. Quinn's report is dated as of 3/2/2024, whereas the ncvoter_Statewide.txt used in this report is dated as of 3/9/2025.

- 2025-02-01
litigation_ticket_124972_Voter_Other_Address_Changes_1stVerify
(1stVfy Oth Address Changes)
 - 2025-02-01
litigation_ticket_124972_Voter_Reg_Address_Changes_1stVerify
(1stVfy Reg Address Changes)
 - 2025-02-01
litigation_ticket_124972_Voter_Other_Address_Changes_Denied
(1stVfy Oth Address Changes)
 - 2025-02-01
litigation_ticket_124972_Voter_Reg_Address_Changes_Denied
(1stVfy Reg Address Changes)
- Notice-and-Cure Process Outcomes in the 2024 Primary and General elections
 - NCSBE_003097 - 2025-02-06 litigation ticket 124972 SDR
Undeliverable Info 2024 Elections
- Verification History for Notice-and-Cure Registrants in the 2024 Primary and General elections
 - NCSBE_003098 - 2025-02-06 litigation ticket 124972 SDR
Undeliverable Verification History 2024.xlsx
- North Carolina State Board of Elections Precinct and Registration Statistics Data for County ID/Name lookup
 - NCSBE_00479.xlsx
- Deposition of Paul Cox
 - Cox 30(b)(6) Deposition (Full) - 02.24.2025 - 4921-7015-8630 1.pdf
- Other sources as cited in the text

III. Overview of Dr. Kevin Quinn's March 5, 2025 Expert Report

Dr. Quinn's report concludes several things based upon his analysis of publicly available data as well as confidential data produced in this matter. I provide an overview of his findings below:

- a. Using Figures 1 through 4 of his report, Dr. Quinn displays trends in early voting and same-day registration (SDR) to show that these processes are generally used more and more over